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Attorneys for Defendants and Counter-Claimant
JONECA COMPANY, LLC and
THE JONECA CORPORATION

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

INSINKERATOR LLC, a Delaware
limited liability company,
Plaintiff,

vs.

JONECA COMPANY LLC, a Delaware
limited liability company, and THE
JONECA CORPORATION, a
California corporation,
Defendants.

JONECA COMPANY LLC, a Delaware
limited liability company,
Counter-Claimant,

vs.

INSINKERATOR LLC, a Delaware
limited liability company,
Counter-Defendant.

Case No.: 8:24-cv-02600-JVS-ADS

Action Filed: November 27, 2024

**JOINT STIPULATION TO SET
BRIEFING SCHEDULE FOR
PLAINTIFF'S MOTION TO
ENFORCE PRELIMINARY
INJUNCTION AND DEFENDANTS'
MOTION TO INCREASE BOND
AMOUNT**

Judge: Honorable James V. Selna

Pursuant to C.D. Cal. Local Rule 7-1 and the Initial Order Following Filing of Complaint Assigned to Judge Selna (ECF No. 16), Plaintiff and Counter-Defendant InSinkErator, LLC (“Plaintiff”) and Defendants and Counter-Claimant Joneca Company, LLC and The Joneca Corporation (“Defendants”) (collectively, “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

1. WHEREAS, Plaintiff filed its Complaint against Defendants on November 27, 2024 (ECF No. 1);

2. WHEREAS, Defendants filed their First Amended Counterclaims against Plaintiff on March 10, 2025 (ECF No. 98);

3. WHEREAS, Plaintiff filed its Unopposed Motion to Modify Case Schedule on July 23, 2025 (ECF No. 124), which the Court granted (ECF No. 126);

4. WHEREAS, Plaintiff filed its Motion to Enforce Preliminary Injunction on August 27, 2025 with a hearing date set for October 20, 2025 at 1:30 p.m. (ECF No. 138);

5. WHEREAS, Defendants intend to file their Motion to Increase Bond Amount on or before September 8, 2025;

6. WHEREAS, the Parties have agreed to a modified briefing schedule for the Motion to Enforce Preliminary Injunction and a modified briefing schedule and proposed hearing date for the Motion to Increase Bond Amount (collectively, “Motions”) in light of the upcoming Court holidays and preexisting obligations, and to allow for the Motions to be heard on the same date;

7. WHEREAS, the proposed briefing schedules and proposed hearing date will not alter the date of any event or deadline already fixed by the Court, is made in good faith, is not for the purposes of any delay, will not prejudice any party or the Court, and is in the interest of judicial efficiency.

NOW, THEREFORE, and subject to the approval of the Court, IT IS HEREBY STIPULATED, by and between the Parties and their respective counsel, and with good cause appearing that:

- i. Defendants shall file their Motion to Increase Bond Amount on or before September 8, 2025;
- ii. Defendants shall file their Opposition to Plaintiff's Motion to Enforce Preliminary Injunction on or before September 19, 2025;
- iii. Plaintiff shall file its Opposition to Defendants' Motion to Increase Bond Amount on or before September 29, 2025;
- iv. Plaintiff shall file its Reply in Support of its Motion to Enforce Preliminary Injunction on or before October 3, 2025;
- v. Defendants shall file their Reply in Support of their Motion to Increase Bond Amount on or before October 6, 2025;
- vi. The hearing on the Defendants' Motion to Increase Bond Amount shall be set for October 20, 2025 at 1:30 p.m.

The Parties respectfully request that the Court enter an order approving this stipulation.

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1 **IT IS SO STIPULATED.**

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4 Dated: August 28, 2025

HOGAN LOVELLS US LLP

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6 By: /s/ Trenton H. Norris

7 Trenton H. Norris

8 *Attorneys for Defendants*
9 *and Counter-Claimant*

10 JONECA COMPANY, LLC and
THE JONECA CORPORATION

11 Dated: August 28, 2025

SUSMAN GODFREY L.L.P.

12
13
14 By: /s/ Kalpana Srinivasan

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Attorneys for Plaintiff and
Counter-Defendant

INSINKERATOR, LLC

ATTESTATION PURSUANT TO CIVIL L.R. 5-4.3.4

The filer attests that the other signatories listed, on whose behalf the filing is also submitted, are registered CM/ECF filers and concur in the filing's content and have authorized the filing.

Dated: August 28, 2025

/s/ Trenton H. Norris

Trenton H. Norris